



July 19, 2002

Chief of Records,
ATTN: Request for Comments, OFAC
Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

Re: Office of Foreign Assets Control Proposed Rules Governing Availability of Information

Dear Sir or Madame:

Spirit of America National Bank (SOANB) wishes to express its concern about the impact of the Office of Foreign Assets Control ("OFAC") proposed rules governing the availability of information (31 CFR Part 501 in the Federal Register). OFAC has proposed publishing specific information on entities subject to civil money penalties or informal settlements. The publication would include the name of the corporate entity sanctioned.

Spirit of America National Bank was chartered under the Competitive Equality Banking Act of 1987 (CEBA) and limits its functions to performing services related to consumer credit card operations. It is a wholly owned subsidiary of Fashion Service Corp., a Delaware corporation, which is a wholly owned subsidiary of Charming Shoppes, Inc.

Businesses recognize their potential for reputation risk every day. With this proposal, publishing corporate names could have a chilling effect upon its future consumer relationships with the general public.

To permit the publication of specific company names even with informal settlements (OFAC's words) without an opportunity to express its reasons for settlement in OFAC's public notice, would lead to a "boycott list". Appearing on this list in light of current events could amount to an anti-patriotic public perception of these businesses and could, if it is a consumer products company, affect their continuation as a viable business. OFAC indicates it wants to make enforcement actions "more transparent", however it would be doing so without recognizing the consequences to a company's viability.

If our corporation's name were published, since we have retail stores in 46 states, each one could be the subject of public protest and complaint. Each local media outlet could run a story using the OFAC publication as its basis. Our public relations representatives would have an impossible time responding to each request for a rebuttal and any company clarification to the news stories would be absent. This negative publicity could impact the jobs of thousands of innocent workers whose employment could be affected through no action on their part.

We also believe that in lieu of publishing specific company names, the public and media could be advised of the individual company since a publicly traded company would disclose any fine or settlement amount in corporate financial filings.

SOANB appreciates the opportunity to comment on the Proposal. If you have any questions on this comment letter, please feel free to the undersigned at 215-633-4829 regarding the issues raised in this letter.

Respectfully submitted,

A handwritten signature in cursive script that reads "John P. Bishop".

John P. Bishop
Compliance Manager
Spirit of America National Bank

cc: William Schroeder, Office of the Comptroller of the Currency
Paul Schieber, Blank Rome Comisky & McCauley, LLP

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